

**From:** [Gary Moore](#)  
**To:** [jcarroll@lazarusenergy.com](mailto:jcarroll@lazarusenergy.com)  
**Subject:** Re: Fw: Falcon Refinery  
**Date:** 02/17/2012 11:58 AM

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John:

Please confirm that you got this message.

Also, I am curious about the arrangement that Lazarus Energy, Blue Dolphin, and the Falcon Refinery Owner (NORCO) have in place. It is key for me to understand the players so that I know where I need to go if things are not going as planned. We have been working this site with NORCO since 2004 and I have to admit that this is the cleanup that I have been involved with primarily because of their stoppage of work for extended periods of time without making us aware. As a result, EPA is skeptical about NORCO's commitment to get this site completed in a timely manner. I like the fact that you guys are involved because I hope this will push things to happen much more quickly.

Please give me your feedback on the arrangement that you guys have with NORCO.

Thanks

Gary Moore  
Federal On-Scene Coordinator  
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▼ Gary Moore---02/13/2012 03:33:46 PM---John: It was nice talking to you. I hope you can assist in getting the removal completed in a timely manner

From: Gary Moore/R6/USEPA/US  
To: [jcarroll@lazarusenergy.com](mailto:jcarroll@lazarusenergy.com)  
Date: 02/13/2012 03:33 PM  
Subject: Fw: Falcon Refinery

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John:

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Gary Moore  
Federal On-Scene Coordinator  
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----- Forwarded by Gary Moore/R6/USEPA/US on 02/13/2012 03:32 PM -----



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From: Gary Moore/R6/USEPA/US  
To: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
Date: 02/13/2012 02:41 PM  
Subject: Falcon Refinery

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Stephen:

Thanks for the updated report. I have the following questions:

If I understand things correctly, the following are the remaining activities:

1. Tank 7,12, and 30: Internal roofs need to be removed so remaining liquid and sludge can be removed. If the tanks are going to be retained, the tanks will be inspected by API 653 to determine repairs needed. If the flooring is damaged (holes, cracks, etc.), such flooring will be removed and the contamination excavated and properly disposed.
2. Tank 26/Wastewater Treatment: Wastewater Treatment System will be installed to treat the water from Tank 26 and irrigate it onsite. Upon completion of the treatment/irrigation activities, the remaining sludge within Tank 26 will be removed and disposed. Tank 26 will then be inspected by API 653 to determine repairs needed. If the flooring is damaged (holes, cracks, etc.), such flooring will be removed and the contamination excavated and properly disposed.
3. All piping and equipment throughout the facility will be completely drained of all materials and properly handled as product or waste as appropriate.
4. All visibly contaminated soils on the Falcon Refinery/NORCO property will be removed and disposed. The RI/FS will determine the fate of the non-visibly contaminated soils throughout the property.

Please let me know if there are other items that are being addressed that have not yet been completed.

On another note, I would like the following information provided to me:

- Copy of Wastewater Treatment and Irrigation Plan
- Copy of the Analytical for the Raw Water that is going to be treated from Tank 26 (Full analytical should have already been done for designing the system). Does this water exhibit a hazardous waste characteristic or toxicity characteristic? If so, the LDRs may apply. Has this been checked out?
- It is my understanding that the refinery unit will be kept intact rather than demo for use by the new owner (all materials must be removed from all this piping and equipment as part of this removal). Also, any asbestos materials within the refinery unit and the whole facility should have already been removed during the early stages of the cleanup.

I will be calling Blue Dolphin shortly to discuss the above.

Thanks

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▼ "Halasz, Stephen (Austin,TX-US)" ---02/06/2012 01:15:58 PM---Gary, In last week's progress report in Section 1, I incorrectly indicated that the Purchaser of the

From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
To: Gary Moore/R6/USEPA/US@EPA, Richard Bergner  
<rbergner@rflaw.net>  
Date: 02/06/2012 01:15 PM  
Subject: error

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Gary,

In last week's progress report in Section 1, I incorrectly indicated that the Purchaser of the refinery is scheduling the removal of Tank 30. I meant to say that the Purchaser is scheduling the removal of the roof. I have included a corrected report.

Stephen Halasz  
Program Manager

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